

CLERK'S OFFICE U.S. DIST, COURT AT CHARLOTTESVILE, VA FILED

OCT 2 8 2020

JULIA G. DUDLEY, CLERK

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA ROANOKE DIVISION OCTOBER 2020 SESSION

UNITED STATES OF AMERICA)	Case No. 7. 20 CROCO69
)	
V)	
WASIL RAFAT FAROOQUI)	
)	In Violation of:
)	18 U.S.C. § 1001(a)(2)
)	

INDICTMENT

The Grand Jury Charges that:

- 1. On or about March 30, 2016, in the Western District of Virginia and elsewhere, the defendant, WASIL RAFAT FAROOQUI, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations.
- 2. On or about March 30, 2016, WASIL RAFAT FAROOQUI was interviewed by Special Agents of the Federal Bureau of Investigation regarding, among other things, his international travel to Turkey, near the border of Syria, and whether he had carried with him or abandoned any of his identification documents, including his Virginia driver's license, when he boarded a flight to Turkey on or about March 28, 2016. WASIL RAFAT FAROOQUI denied such activity.
- 3. Specifically, the following statements by WASIL RAFAT FAROOQUI (in bold) were false:

- Q: ... [Y]ou didn't take [your driver's license] with you?
- A: No.
- Q: [Before your flight left the police] took a picture of you. They also took a picture of your driver's license?
- A: Yeah.

. . .

- Q: Did you then go back to your car and put it there?
- A: [Y]eah, I, I went, I went back to my car and I got my other ticket from Gaziantep and then boarded the plane.
- Q: What other stuff did you have in the car?
- A: ... ah, license because I knew I was going across the sea. I'm not taking that, I'm not taking my driver's license with me. So, I left it back in the car.
- 4. At the time of the interview, WASIL RAFAT FAROOQUI knew that in truth and in fact, WASIL RAFAT FAROOQUI did not return to his car and had not left his driver's license in his car before he traveled to Turkey.
- 5. The Federal Bureau of Investigation is an agency of the executive branch of the Government of the United States.

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6. All in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL, this <u>J8</u> day of <u>October</u>, 2020.

/s/ Grand Jury Foreperson FOREPERSON

DANIEL P. BUBAR

ACTING UNITED STATES ATTORNEY